

FILED

2019 MAR 29 AM 8:40

Judge: The Honorable Christopher M. Alston
Chapter: 7

M. L. HATCHER, CLK
U.S. BANKRUPTCY COURT
W.D. OF WA AT SEATTLE
BY _____ DEP. CLK.

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

JACK CARLTON CRAMER, JR,

Debtor,

No. 18-13383-CMA

**DEBTOR'S MOTION FOR
VOLUNTARY DISMISSAL OF
CASE**

COMES NOW the Debtor, JACK CARLTON CRAMER, JR and asks the Court for immediate entry of an Order dismissing this case, for cause under 11 U.S.C. § 707(a). I no longer need bankruptcy protection and no creditor will be prejudiced by this case's immediate dismissal.

DATED this 28th day of March 2019.

By: Jack Carlton Cramer, Jr.

JACK CARLTON CRAMER, JR

DECLARATION OF JACK CARLTON CRAMER, JR

I, Jack Carlton Cramer, Jr, am over the age of 18, am the Debtor in this case, and

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VOLUNTARY DISMISSAL OF CASE**

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Jack C. Cramer, Jr.
425-354-0987

1 state the following based upon my own personal knowledge:

2 1. I am no longer in need of the protection of the bankruptcy automatic stay,
3 and so I wish to voluntarily dismiss my case.

4 2. No creditor will be prejudiced by my dismissing this bankruptcy; In fact,
5 the primary creditor who has been threatening to sell my property to satisfy their lien, 21st
6 Mortgage Corporation, objected to the conversion of this case to a Chapter 7, and will be
7 paid in full by the method that I have arranged that will also pay off the IRS and all of my
8 other debts once this bankruptcy is dismissed: A reverse mortgage on my home.

9 3. I am 75 years old and have over 50% equity in my home, which is
10 essentially my only asset. I am qualified for a reverse mortgage on that home as a result of
11 my age and that equity.

12 4. The total debt against my property is:

Judgment Liens:	\$ 40,710.68;
IRS:	\$ 55,514.39;
Property Taxes:	<u>\$ 22,148.09;</u>
Total:	\$118,373.16

15 5. The King County Assessed value for my home is \$563,000.00 for 2018.
16 Fair Market Value is generally about 15% above assessed value historically, so the FMV
17 of my home is close to \$647,000.00.

18 6. Using \$647,000.00 as my FMV, I have 80% equity in my home, and am
19 unwilling to allow the trustee to seize my home, sell it to receive his kickback of a
20 percentage of the sale price and to line the pockets of his real estate broker who will
21 receive a 6% commission on the sale.

22 7. Good cause is established for this dismissal under 11 U.S.C. § 707(a).

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1 The foregoing is true and correct to the best of my knowledge and belief under
2 penalty of perjury under the laws of the State of Washington.

3 Dated this 28th day of March 2019.

4 By: 
5 JACK CARLTON CRAMER, JR

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